

24 July 2019

Mr Alex Sutton
ASX Compliance Pty Limited
20 Bridge St
Sydney NSW 2000

By email: Alex.Sutton@asx.com.au ;

Dear Alex,

Response to price query

We refer to a price query by the Australian Securities Exchange dated 23 July 2019.

In response to the specific questions of the price query and using the same numbering;

1. The Company is not aware of any information concerning it that has not been announced which, if known, may explain the recent trading pattern in the securities of Archer Exploration Limited. However, the Company has noticed an increase in share price and share trading activity since the Company announced:
 - a. The assembly of the first nanoscale materials components of the ¹²CQ qubit processor (chip) prototype (ASX announcement 26 June 2019).
 - b. Completion of the sale of the Sugarloaf farm land for \$1.35 million cash (ASX announcement 1 July 2019).
 - c. Identification of scheelite hosted tungsten on Archer's Broken Hill tenements and the application for a new tenement over a historic tin mining area (ASX announcement 10 July 2019).

The Company has not provided any earnings guidance for the 12 months ending on 30 June 2019 and is not aware of any analyst forecasts regarding the same. The Company is not aware of any information regarding earnings for the period ending 30 June 2019 that, in the Company's opinion, "is likely to come as a surprise to the market".

2. Not applicable.
3. The assembly of the first nanoscale materials components of the qubit processor prototype was a major achievement of the Company. The technical development at the heart of ¹²CQ is a world-first. The ¹²CQ developments and the identification of scheelite hosted tungsten on the Company's tenements may explain the recent trading in Company securities.

4. Archer Exploration Limited confirms that it is in compliance with the ASX listing rules and, in particular, with listing rule 3.1.
5. The Company confirms that this letter has been approved by its board.

Yours faithfully,



Damien Connor
Company Secretary
Archer Exploration Limited (ASX:AXE)



23 July 2019

Mr Damien Connor
Company Secretary
Archer Exploration Limited
Level 1 28 Greenhill Road
Wayville, SA 5034

By email:

Dear Mr Connor

Archer Exploration Limited ('AXE'): Price Query

We note the change in the price of AXE's securities from a low of \$0.11 to a high of \$0.142 today.

We also note the significant increase in the volume of AXE's securities traded from 19 July 2019 to 23 July 2019.

Request for Information

In light of this, ASX asks AXE to respond separately to each of the following questions and requests for information:

1. Is AXE aware of any information concerning it that has not been announced to the market which, if known by some in the market, could explain the recent trading in its securities?

[In responding to this question, please consider in particular whether AXE is aware of any information that its earnings for the 12 month period ending on 30 June 2019:
 - (a) are likely to differ materially (downwards or upwards) from any earnings guidance it has given for the period; or
 - (b) if AXE has not given any earnings guidance for the period, are otherwise likely to come as a surprise to the market (by reference to analyst forecasts for the period or, if AXE is not covered by analysts, its earnings for the prior corresponding period)?]
2. If the answer to question 1 is "yes".
 - (a) Is AXE relying on Listing Rule 3.1A not to announce that information under Listing Rule 3.1? Please note that the recent trading in AXE's securities would suggest to ASX that such information may have ceased to be confidential and therefore AXE may no longer be able to rely on Listing Rule 3.1A. Accordingly, if the answer to this question is "yes", you need to contact us immediately to discuss the situation.
 - (b) Can an announcement be made immediately? Please note, if the answer to this question is "no", you need to contact us immediately to discuss requesting a trading halt (see below).
 - (c) If an announcement cannot be made immediately, why not and when is it expected that an announcement will be made?
3. If the answer to question 1 is "no", is there any other explanation that AXE may have for the recent trading in its securities?
4. Please confirm that AXE is complying with the Listing Rules and, in particular, Listing Rule 3.1.

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5. Please confirm that AXE's responses to the questions above have been authorised and approved under its published continuous disclosure policy or otherwise by its board or an officer of AXE with delegated authority from the board to respond to ASX on disclosure matters.

When and where to send your response

This request is made under Listing Rule 18.7. Your response is required as soon as reasonably possible and, in any event, by no later than **9:30 AM AEST tomorrow Wednesday, 24 July 2019**. If we do not have your response by then, ASX will likely suspend trading in AXE's securities under Listing Rule 17.3. You should note that if the information requested by this letter is information required to be given to ASX under Listing Rule 3.1 and it does not fall within the exceptions mentioned in Listing Rule 3.1A, AXE's obligation is to disclose the information "immediately". This may require the information to be disclosed before the deadline set out in the previous paragraph.

ASX reserves the right to release a copy of this letter and your response on the ASX Market Announcements Platform under Listing Rule 18.7A. Accordingly, your response should be in a form suitable for release to the market. Your response should be sent to me by e-mail at ListingsComplianceSydney@asx.com.au. It should not be sent directly to the ASX Market Announcements Office. This is to allow me to review your response to confirm that it is in a form appropriate for release to the market, before it is published on the ASX Market Announcements Platform.

Listing Rules 3.1 and 3.1A

Listing Rule 3.1 requires a listed entity to give ASX immediately any information concerning it that a reasonable person would expect to have a material effect on the price or value of the entity's securities. Exceptions to this requirement are set out in Listing Rule 3.1A. In responding to this letter, you should have regard to AXE's obligations under Listing Rules 3.1 and 3.1A and also to Guidance *Note 8 Continuous Disclosure: Listing Rules 3.1 – 3.1B*. It should be noted that AXE's obligation to disclose information under Listing Rule 3.1 is not confined to, nor is it necessarily satisfied by, answering the questions set out in this letter.

Trading halt

If you are unable to respond to this letter by the time specified above, or if the answer to question 1 is "yes" and an announcement cannot be made immediately, you should discuss with us whether it is appropriate to request a trading halt in AXE's securities under Listing Rule 17.1. If you wish a trading halt, you must tell us:

- the reasons for the trading halt;
- how long you want the trading halt to last;
- the event you expect to happen that will end the trading halt;
- that you are not aware of any reason why the trading halt should not be granted; and
- any other information necessary to inform the market about the trading halt, or that we ask for.

We may require the request for a trading halt to be in writing. The trading halt cannot extend past the commencement of normal trading on the second day after the day on which it is granted.

You can find further information about trading halts in Guidance Note 16 *Trading Halts & Voluntary Suspensions*.

Suspension

If you are unable to respond to this letter by the time specified above ASX will likely suspend trading in AXE's securities under Listing Rule 17.3.

Enquiries

If you have any queries or concerns about any of the above, please contact me immediately.

Kind regards

Alex Sutton

Alex Sutton

Compliance Adviser, Geology, Listings Compliance (Sydney)